

Albano, Emily

From: Arndt, Jeremy [DNR] <Jeremy.Arndt@dnr.iowa.gov>
Sent: Tuesday, January 14, 2014 12:55 PM
To: Peter, David
Subject: RE: CAM Applicability Determination Assistance

Lori would like to sit in if possible. She has a meeting set up at 2 so if we can fit it in before then it would be great. If not, I would still like to talk with you today. Let me know what your schedule looks like for today.

From: Peter, David [mailto:peter.david@epa.gov]
Sent: Tuesday, January 14, 2014 12:23 PM
To: Arndt, Jeremy [DNR]
Cc: Hanson, Lori [DNR]
Subject: RE: CAM Applicability Determination Assistance

Jeremy – I have had a chance to discuss these issues internally and I was wanting to give you a call. Would you (and Lori if appropriate) be available this afternoon? If not, I will likely be available Friday and most of next week. David

From: Arndt, Jeremy [DNR] [mailto:Jeremy.Arndt@dnr.iowa.gov]
Sent: Tuesday, January 07, 2014 12:51 PM
To: Peter, David
Subject: RE: CAM Applicability Determination Assistance

They did submit a cost of material recovered analysis with the comments they sent during the public comment periods. The analysis was done using the potential uncontrolled emissions numbers that I used to figure CAM applicability in the first place, so there are no numbers from them based on actual production. I have attached these comments for your review.

From: Peter, David [mailto:peter.david@epa.gov]
Sent: Tuesday, January 07, 2014 11:29 AM
To: Arndt, Jeremy [DNR]
Subject: RE: CAM Applicability Determination Assistance

Jeremy,

I wanted to make sure that this is all the information that AGP submitted. Did they submit anything that discussed the amount of material that was recovered by each “control device” and/or the value of that material compared to the costs of the control equipment and/or the overall revenue/profit of the facility? I didn’t see anything like that in the documentation that you sent.

David Peter
Environmental Engineer
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
913-551-7397

From: Arndt, Jeremy [DNR] [mailto:Jeremy.Arndt@dnr.iowa.gov]
Sent: Monday, December 09, 2013 10:38 AM
To: Peter, David

Cc: Hanson, Lori [DNR]; Seda, Ann [DNR]
Subject: RE: CAM Applicability Determination Assistance

Sorry I forgot the attachments. [Here they are.](#)

From: Arndt, Jeremy [DNR]
Sent: Monday, December 09, 2013 10:23 AM
To: David Peter (Peter.David@epamail.epa.gov)
Cc: Hanson, Lori [DNR]; Seda, Ann [DNR]
Subject: CAM Applicability Determination Assistance

David,

As you know, we are in process of resolving Title V permit appeals from two Ag Processing Inc. facilities located in Iowa. The appeals question the applicability of CAM to baghouses and cyclones located at these facilities. Ag Processing argues that because the baghouses and cyclones associated with the processes recover product that is reintroduced back into the process, that these baghouses and cyclones are considered to be "inherent process equipment" and, therefore, are not subject to CAM.

Based on the information that Ag Processing has provided to support their determination, IDNR has determined that this equipment is "control equipment" and is, therefore, subject to CAM requirements.

I have attached the correspondence associated with these appeals. Based on the provided information, does Region 7 agree with IDNR's determination that the baghouses and cyclones at these Ag Processing facilities are "control equipment" rather than "inherent process equipment"?

JEREMY ARNDT Environmental Specialist



Iowa Department of Natural Resources

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